

REMARKS

The present application includes pending claims 1-41, all of which have been rejected. Claims 1 and 26 have been amended.

Claims 1-24 and 26-41 stand rejected under 35 U.S.C. 102(e) as being anticipated by United States Patent No. 7,065,778 ("Lu"). Claim 25 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lu in view of United States Patent No. 6,477,708 ("Sawa"). The Applicants respectfully traverse these rejections for at least the reasons previously discussed during prosecution and the following.

I. Lu Does Not Anticipate Claims 1-11

Lu "relates to the field of utilizing personalized video recorders and other similar types of devices to distribute television programming." *See* Lu at column 1, lines 7-11. In particular, Lu discloses a system in which a user is able to record a show that is transmitted in another broadcast area. *See id.* at Abstract.

For example, Lu describes the following:

Specifically, personalized video recorder 200 is coupled to the Internet 302 such that it can receive an electronic programming guide (EPG) containing worldwide television programming from an EPG server computer 304. The user of personalized video recorder 200 utilizes the EPG to request delivery of a specific television show that may not be available to him or her. Upon reception of the request from personalized video recorder 200, EPG server computer 304 locates via Internet 302 one or more personalized video recorders... situated within a broadcast region of the requested television show. Subsequently, EPG server computer 304 programs one or more personalized video recorders... to record the requested television show when it is broadcast by a television content provider.... Once the personalized video recorders... record the television show, one or more of the personalized video recorders may transmit it to EPG server computer 304 which then transmits it to the requested

personalized video recorder 200. In this manner, the present embodiment enables personalized video recorder 200 to order and receive specific television shows that are unavailable from its television content provider....

Lu at column 6, lines 39-61. Thus, Lu discloses a system in which a user sends a recording request that is received by a server computer via the Internet. The server computer then arbitrarily locates a recorder within the broadcast region of the show, and then sends the recorded show back to the requesting user.

A. A User Interface At The First Location Supporting The Selection And Scheduling Of Media Delivery To A Second Location

Lu does not describe, teach, or suggest a “user interface, at the first location, supporting the selection and scheduling of media delivery to a second location,” as recited in claim 1. The Office Action cites Lu at column 6, lines 43-45 and 50-58 as disclosing these limitations. See November 7, 2007 Office Action at pages 2 and 5. These portions of Lu recite, however, the following:

The user of personalized video recorder 200 utilizes the EPG [electronic programming guide] to request delivery of a specific television show that may not be available to him or her.

* * *

Subsequently, EPG server computer 304 programs one or more personalized video recorders (e.g., 200A and/or 200B) to record the requested television show when it is broadcast by a television content provider (e.g., television head-end 308). Once the personalized video recorders (e.g., 200A and 200 B) record the television show, one or more of the personalized video recorders may transmit it to EPG server computer 304 which then transmits it to the requesting personalized video recorder 200.

Lu at column 6, lines 43-58. Thus, in Lu, the user requests delivery for a television show at **his/her location** through the EPG. The EPG then arbitrarily locates a PVR in another area to

record the show. After the show is recorded, the show is delivered to the user at his/her location via the EPG server. **In Lu, selection and delivery of the show both occur at a single location.** That is, the user selects the show from his/her location, and the show is eventually delivered to that same location.

As noted above, the Office Action cites Lu at column 6, lines 43-45, as disclosing the relevant claim limitations. This portion of Lu recites, however, the following:

The user of personalized video recorder 200 utilizes the EPG to request delivery of a specific television show that may not be available to him or her.

Clearly, the user is not traveling from his/her home to the location of the EPG to request delivery. Instead, the user requests delivery from his/her home. That request is then sent to the EPG, which then arbitrarily locates a PVR in the broadcast area of the show. The recorded show is then sent back to the user at his/her home. Again, the request/selection of a television show is performed at the user's home (i.e., a first location). The show is then delivered to the user's home (i.e., the first location). Lu does not describe, teach or suggest, however, a "user interface at the first location supporting the **selection and scheduling of media delivery to a second location,**"

Lu does not describe, teach or suggest a system in which a user at a first location selects a show that is delivered to a completely different location, as recited in this limitation (i.e., "user interface, **at the first location,** supporting the selection and scheduling of media delivery to a **second location**"). Neither the cited passages, nor the remainder, of Lu describes, teaches or suggests a "user interface, at the **first location,** supporting the selection and scheduling of media

delivery to a second location,” as recited in claim 1. Thus, for at least this reason, the Applicants respectfully submit that Lu does not anticipate claims 1-11.

B. Server Software That Maintains A User Defined Association Of The First And Second Network Addresses

Claim 1 has been amended to recite a first storage for storing media, at the first location, and having a first network address **with respect to a first user at the first location**; ...at least one multimedia display, at the second location, communicatively coupled to the second set top box, and having a second network address **with respect to a second user at the second location, wherein the second user is known to the first user**; and server software that maintains a user defined association of the first and second network addresses [with respect to first and second users, respectively, at first and second locations, respectively, who are known to each other].” The Applicants respectfully submit that there is nothing in Lu that describes, teaches or suggests these limitations. Thus, for at least these reasons, the Applicants respectfully submit that Lu does not anticipate claims 1-11.

The Office Action cites Lu at column 6, lines 54-58 as disclosing “server software that maintains a user defined association of the first and second network addresses.” See November 7, 2007 Office Action at pages 3 and 6. This cited portion of Lu states, however, the following:

Once the personalized video recorders (e.g., 200A and 200B) record the television show, one or more of the personalized video recorders may transmit it to EPG server computer 304 which then transmits it to the requesting personalized video recorder 200.

Lu at column 6, lines 54-58. This portion of Lu merely indicates that a recorder requests a show, and then the EPG arbitrarily finds another recorder in a broadcast area to record the show for the requesting recorder. This portion of Lu does not indicate that a user defines an association

between first and second network addresses, or that a server **maintains that user defined association**. In general, there is nothing in this cited portion, nor the remainder, of Lu that describes, teaches or suggests “server software that **maintains a user defined association of the first and second network addresses**,” as recited in claim 1. Thus, for at least these reasons, the Office Action has not established a *prima facie* case of anticipation with respect to claims 1-11. Indeed, these claims are allowable over the cited art.

The Applicants respectfully submit that Lu does not describe, teach or suggest “server software that **maintains a user defined association of the first and second network addresses**, that receives a **request** identifying one of the first and second associated network addresses, and that **responds by identifying the other of the associated first and second network addresses** to support delivery,” as recited in claim 1. Thus, for at least these reasons, Lu does not anticipate claims 1-11.

II. Lu Does Not Anticipate Claims 12-20

The Applicants now turn to claim 12, which recites, in part, “a user interface, at the first location, having at least one view comprising a representation of media available for consumption, the user interface supporting the selection and scheduling of media for delivery at **a second location**.” The Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation with respect to claims 12-20, nor does Lu anticipate claims 12-20, for at least the reasons discussed above in Section I.A.

Additionally, claim 19 recites, in part, “wherein the at least one multimedia display comprises: at least one sensor for detecting a condition, at the first home; and the detection of the condition resulting in a change in the media displayed.” The Office Action cites column 6,

lines 8-17 of Lu as disclosing this limitation. *See* November 7, 2007 Office Action at page 11.

However, this portion of Lu states the following:

Additionally, the personalized video recorder 200 of FIG. 2 can include an optional remote control device 216 (e.g., a universal remote control device having a number of buttons, dials, etc.) which is communicatively coupled to bus 210 for communicating user input information and command selections to the central processor(s) 202. It is appreciated that remote control device 216 may be implemented with the capability to communicate with personalized video recorder 200 utilizing wireless communication (e.g., infrared signaling).

Lu at column 6, lines 8-17. This portion of Lu merely discloses a remote control that may be used with the PVR. Remote controls transmit signals to a device to operate the device, etc. Lu does not disclose that the remote control itself receives any signals or “detects” anything. In short, nothing in this passage describes, teaches or suggests “at least one sensor for detecting a condition, at the first home; and the detection of the condition resulting in a change in the media displayed,” as recited in claim 19. Thus, for at least this additional reason, the Office Action has not established a *prima facie* case of anticipation with respect to claim 19.

III. Lu Does Not Anticipate Claims 21-24

Claim 21 recites, in part, “scheduling media for delivery from a **first location to a second location** based on input from the user at the second location.” The Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation with respect to claims 21-24, nor does Lu anticipate these claims for at least the reasons discussed above in Section I.A.

IV. The Proposed Combination Of Lu And Sawa Does Not Render Claim 25 Unpatentable

The Applicants respectfully submit that the proposed combination of Lu and Sawa does not render claim 25 unpatentable for at least the reasons discussed above in Section III.

V. Claims 26-41 Are In Condition For Allowance

The Applicants respectfully submit that claims 26-41 should be in condition for allowance over the cited references for at least the reasons discussed above with respect to claim 1.

VI. Conclusion

In general, the Office Action makes various statements regarding claims 1-41 and the cited references that are now moot in light of the above. Thus, the Applicants will not address such statements at the present time. The Applicants expressly reserve the right, however, to challenge such statements in the future should the need arise (e.g., if such statement should become relevant by appearing in a future claim rejection).

The Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation or obviousness with respect to any of the pending claims for at least the reasons discussed above and request that the outstanding rejections be reconsidered and withdrawn. If the Examiner has any questions or the Applicants can be of any assistance, the Examiner is invited to contact the undersigned attorney for Applicants.

Appln. No. 10/675,084
Amendment Under 37 C.F.R. § 1.114
January 10, 2008

The Commissioner is authorized to charge any necessary fees, including the \$810 fee for the RCE, or credit any overpayment to the Deposit Account of McAndrews, Held & Malloy, Account No. 13-0017.

Respectfully submitted,

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MCANDREWS, HELD & MALLOY, LTD.
500 West Madison Street, 34th Floor
Chicago, Illinois 60661
Telephone: (312) 775-8000
Facsimile: (312)775-8100

/Joseph M. Butscher/
Joseph M. Butscher
Registration No. 48,326
Attorney for Applicants